



U.S. Department of Justice

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Filed Electronically

THE HONORABLE ROBERT D. MARIANI
U.S. District Court for the Middle District of Pennsylvania

Re: United States v. Kurt Moran, 3:20-cr-228

Dear Judge Mariani:

The Government respectfully submits this letter in response to the defendant's August 22, 2022 motion to continue sentencing in this matter (filed under seal). As noted in the defendant's motion, the Government does not concur in the request.

Upon review of the medical report in support of the defendant's motion, it does not appear that a continuance is necessary. The report indicates that the defendant's physician is recommending additional medical tests in order to rule out a myriad of issues seemingly related to stress, anxiety, and other age related issues. However, nothing in the report is so exceptional or compelling so as to cause another delay in this case. It is the Government's position that upon imposition of sentence, the court could impose a surrender date for the defendant's initiation of serving his sentence. A reasonably delayed surrender date would allow time for the defendant to undergo the recommended medical tests, as well as allow time for the BOP to designate the appropriate facility to which the defendant will report.

Respectfully,

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UNITED STATES ATTORNEY

/s/ Michelle Olshefski
MICHELLE OLSHEFSKI
Assistant United States Attorney

cc: e-filed to MDPA Dkt. #: 3:20-CR-228